

MARLON COBAR
Chief, Narcotic and Dangerous Drug Section
Criminal Division
United States Department of Justice
MELANIE L. ALSWORTH, Ark. Bar No. 2002095
Acting Assistant Deputy Chief
melanie.alsworth2@usdoj.gov
145 N. Street NE, 2nd Floor, East Wing
Washington, D.C. 20530
Telephone (202) 598-2285

Attorneys for the United States

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,
v.
ENHUA FANG,
Defendant.

CASE NO. 3:24-MJ-00072

**GOVERNMENT'S SUPPLEMENTAL
MOTION FOR PRETRIAL DETENTION**

The United States of America, through Melanie L. Alsworth, United States Department of Justice, submits this supplemental motion for pretrial detention of Enhua Fang (“FANG” or “the defendant”).

On April 18, 2024, the government obtained additional facts that further warrant pretrial detention of the defendant due to a significant risk of flight. These additional facts demonstrate that she has no ties to the community and insignificant ties to the United States.

First, the defendant’s immediate family remains in China. These family members can provide an easy safe haven for the defendant should she flee the United States. The defendant may assert that she her passport was seized and she will be unable to leave the United States; however, this argument lacks merit. As discussed in the government’s motion for pretrial detention filed on April 18, 2024, the Organization is known to possess and use high quality false

identification documents. In fact, on April 18, 2024, law enforcement officers seized two fake driver's licenses from her boyfriend similar to those possessed and used by co-defendants in this investigation. This indicates that the defendant and those close to her have access to, and have indeed utilized, criminal resources to obtain fake travel documents that can aid in her flight.

Second, the defendant maintains an elusive presence in the United States. The defendant has no permanent residence in either Oregon or New York, both places she is known to have lived. She does not appear to pay rent and has no known assets, such as houses or vehicles, in her name. Nor is the defendant employed.

For these reasons and those detailed in the April 18, 2024, motion for pretrial detention, the defendant should be detained. There are no condition or combination of conditions that can be placed upon the defendant that will reasonably assure the defendant's appearance at future court proceedings. The United States respectfully requests that the Court detain the defendant pending trial and find that she poses an unacceptable risk of non-appearance at future court hearings.

Dated: April 23, 2024.

Respectfully submitted,

MARLON COBAR, Chief
Narcotic and Dangerous Drug
Section
Criminal Division
U.S. Department of Justice

By:

/s/ Melanie L. Alsworth
Melanie L. Alsworth
Acting Assistant Deputy Chief
Narcotic and Dangerous Drug Section
Criminal Division
U.S. Department of Justice
145 N. Street NE, 2E300
Washington, D.C. 20530
Telephone: (202) 598-2285
Email: melanie.alsworth2@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via ECF to counsel of record, this 18th day of April 2024.

By: /s/ Melanie L. Alsworth
Melanie L. Alsworth
Acting Assistant Deputy Chief
United States Department of Justice